



**Ventura County
Air Pollution
Control District**

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

**Michael Villegas
Air Pollution Control Officer**

July 30, 2010

Mr. Jared Blumenfeld, Regional Administrator
Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Regarding: Implementation of Greenhouse Gas Tailoring Rule for PSD and Title V

Dear Mr. Blumenfeld:

This letter is being submitted pursuant to the notification request in EPA's recently promulgated "Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" (Tailoring Rule) under 75 FR 31514, Sections IV.C and V.C.5.

The Ventura County Air Pollution Control District (VCAPCD) currently does not implement the Prevention of Significant Deterioration (PSD) requirements of Part 52. The District does implement an approved Title V permitting program under Part 70.

VCAPCD is participating in coordinated efforts with the California Air Pollution Control Officers Association (CAPCOA) on PSD and the Tailoring Rule. CAPCOA is undertaking development of two model rules. One rule will implement the requirements of PSD, and the other will implement the requirements of the Tailoring Rule. Both efforts are being undertaken in collaboration with EPA Region IX staff.

The PSD model rule effort is being led by Placer County Air Pollution Control District. At a minimum, it will incorporate the PSD program by reference, and it may include more specific local implementation language. Any questions on this model rule effort should be directed to Tom Christofk, the Air Pollution Control Officer in Placer County.

The second effort will produce a model general prohibitory rule that will (1) establish major source thresholds for GHGs consistent with the Tailoring Rule; (2) limit potential to emit consistent with the procedures and principles developed with EPA for Title V sources of other regulated air pollutants; and (3) establish monitoring, recordkeeping, reporting, enforcement, and other administrative requirements. Questions about the second model rule should be directed to Barbara Lee, the Air Pollution Control Officer in Northern Sonoma.

Because of the shortness of the implementation time frames for the Tailoring Rule, CAPCOA does not yet have model language for us to evaluate, however we expect to have language in the next 60 days. VCAPCD will inform EPA Region IX of our intent to adopt either of these model

rules by October 1, 2010, or whether we will pursue a different implementation path. We intend to adopt rule amendments to implement the Tailoring Rule by December 14, 2010. At this time, VCAPCD is developing rule amendments to implement the Tailoring Rule separate from the CAPCOA effort.

If you have any questions regarding the individual model rules, please address them to the contacts identified for the rules. You are welcome to contact me at 805/645-1440 with any other questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Villegas". The signature is fluid and cursive, with the first name "Michael" and last name "Villegas" clearly distinguishable.

Michael Villegas

Air Pollution Control Officer